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Copey



# COMMONWEALTH of VIRGINIA

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May 30, 2007

Milari Madison  
39800 Waterfordway Lane  
Waterford, Virginia 20197

Dear Ms. Madison:

I am writing in response to your petition to de-list the Waterford Historic District. My staff and I have considered your request in depth. We are responding only to factual issues and whether or not those facts support your request to de-list the Virginia Landmarks Register historic district. Legal determinations and local jurisdictional matters must be resolved in appropriate forums and those forums are other than the Department of Historic Resources.

In considering your request, I called on the Department's multidisciplinary Architectural Evaluation Committee, which is tasked with making recommendations on eligibility. The Committee's deliberations, including a field inspection, confirmed that the district fully meets the criteria for listing on the Virginia Landmarks Register, provided in 17VAC5-30-40 through 17VAC5-30-70. Consistent with the original listing the district meets in particular Criterion 1, Criterion 3, and Criterion 4. The Committee also assessed physical integrity, as addressed in 17VAC5-30-50, and concluded that Waterford Historic District retains a high degree of integrity that warrants continued listing. Specifics of criteria and integrity, as they relate to this district and informed our decision, are outlined in the attached staff report. I discussed the recommendation with Committee members and I agree with their recommendation that the Waterford Historic District continues to meet the criteria for listing on the Virginia Landmarks Register.

Much of your argument hinges on whether or not historic designation requires that both material and function remain unchanged. Please be aware that modern historic preservation practice allows and even embraces change within historic properties and districts, as provided in the Standards for Rehabilitation used throughout the state as noted in 17VAC10-30-60. These standards have never required that the historic function of a building be retained, but that new uses involve minimal change to the "defining characteristics of the building." Allowing for change of function according to these standards has enabled many historic property owners to adaptively re-use historic properties, while preserving those elements that convey the historic and architectural significance of their homes and businesses.

Thank you for the opportunity to review the status of an important Virginia resource.

Sincerely,

A handwritten signature in black ink, appearing to read "Kilpatrick", written over a horizontal line.

Kathleen S. Kilpatrick  
Director and State Historic Preservation Officer

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## **Waterford Historic District Petition to De-List: Staff Findings**

The Architectural Evaluation Committee, comprised of archaeology, architectural history, historic preservation planning, history, and cultural landscape staff, reviewed the Waterford Historic District to assess whether or not the district still met the eligibility requirement meeting criteria of significance and physical integrity to retain its listing as on the Virginia Landmarks Register at regularly scheduled team meetings on May 13 and 17. In addition, a multidisciplinary team (historian, archaeologist, landscape architect, architectural historians) including members of the easement and tax credit teams conducted a detailed field inspection on May 15. During that inspection the team paid particular attention to viewsheds looking into and out of the core village and along the primary entry corridors into the district. Staff both drove around most of the village and conducted visual inspections on foot for much of the core area, looking for evidence of loss of physical integrity and/or major intrusions. What we found was that the village and district remain remarkably intact as summarized below.

### **Regarding 17VAC5-30-40 Historic Significance (the resource must meet at least one of four criteria):**

*Criterion 1. The resource is associated with events that have made a significant contribution to the broad patterns of our history*

The establishment of a Quaker community in Loudoun County Virginia, and the fact that it is one of the best examples of this type of village in Virginia (and possibly in the eastern United States), is an association with events that have made a significant contribution to the broad patterns of the Commonwealth's and Nation's history. Quaker influence on building styles and techniques, as well as social and religious beliefs in this part of Virginia is well established. The nomination states that Waterford was founded as a "Quaker village about 1730." The Asa Moore House on Main Street, noted in the nomination as the first house in the settlement, is still standing and marks the beginning point of the Period of Significance for the Historic District, c. 1730. The date of 1919 is assumed as the end date of the Period of Significance, since in 1969, the cut-off for the Period of Significance was 50 years prior to the application date, as per Virginia Landmarks Register/National Park Service regulations. The Fairfax Meeting House, an important component of Quaker social and religious activity, is just one of several important touchstones for Waterford's long historic evolution. While there is not a single critical event, the broad pattern of Quaker settlement is of very high value in our consideration for significance.

*Criterion 3. The resource embodies the distinctive characteristics of a type, period, or method of construction or design, or represents the work of a master (for example, an individual of generally recognized greatness in a field such as architecture, engineering, art, or planning, or a craftsman whose work is distinctive in skill or style), or possesses high artistic values, or is a district that taken as a whole embodies one or more of the preceding characteristics, even though its components may lack individual distinction-*

Based on observations made on site and comparisons with earlier photographs, the Committee confirmed that the distinctive characteristics of a type, period, or method of construction or design and high value of craftsmanship were still evident. The Physical Description in the 1969 nomination reads:

“Waterford is notable for the great variety of building materials used, including brick, stone, log and frame, as well as for the variety of architectural styles . Especially interesting are the brick mill (c.1750); the Arch House Row of stone , brick and wood (c.1750); the Camelot School, a two-story log building (c.1800); the neo-classic Baptist Church of 1850; and the romantic Victorian Presbyterian Church of 1882.”

All buildings noted in this description were confirmed intact and still convey their historic appearance. While the village has evolved over time, it is clear that log, stone, and brick construction methods brought to the community from early German and Scots-Irish settlers’ construction traditions are evident in highly intact condition. Modern historic preservation allows for change; specifically, the National Park Service and the State of Virginia provide guidance through the Secretary of Interior’s Standards for Rehabilitation (<http://www.cr.nps.gov/hps/tps/tax/rhb/stand.htm>, also found in 17VAC10-30-60) on treatment of historic buildings and structures. The term “rehabilitation” implies that some repair or alteration of a historic property will be necessary for modern use. This allowance for change has become part of preservation ethic, and Waterford’s residents have maintained a careful approach to the treatment of their historic buildings. The Committee looked for substantial erosion of the historic fabric, substantial amounts of modern materials (such as metal, plastics, and open span glass), and did not see any significant amount of these materials.

In an effort to determine whether enough of the historic architecture had been removed, altered, or obscured to cause delisting, the Committee sought out examples of recent additions that could detract from the original buildings due to addition size, massing, materials, and design. Keeping in mind that at the time the historic district was listed in 1969, many buildings had already evolved with typical changes that occur to houses over time, the Committee did not see any additions that detracted from the distinctive characteristics of the overall historic district. Most additions were subordinated to the original historic building designs.

The Committee did note that within the village area, there appear to be 8 non-contributing buildings (i.e. post 1919 in construction date) and a recently demolished building site. There appear to be more than 100 buildings in the village, so the 8 modern buildings do not comprise a majority of the construction, nor do any of these impose on the continuity and visual cohesiveness of the historic fabric. Additionally, some of the non-contributing buildings in fact have potential to meet historic criteria, if the period of significance were expanded to the current 50-year cut off, 1957. The common use of the 50-year cut off allows the evolution of properties and districts to be taken into account when evaluating historic significance. If we were drafting a new nomination for the historic district, we would, for instance, suggest that the Loudoun Mutual Insurance Company, a 61 year-old building designed by architect Albert Leuders, be considered a contributing resource.

The Waterford Mill, the most impressive building associated with Waterford’s industrial past, is one among a rare group of pre-Civil War mill buildings in Loudoun County. The survival of a mill building of this size, given that mills were typically the target of Union forces, is surprising. The Committee noted that the distinctive building with mill race and metal Fitz wheel still in place is potentially individually eligible for the state and national registers.

*Criterion 4. The resource has yielded or is likely to yield, normally through archaeological investigation, information important in understanding the broad patterns or major events of prehistory or history.*

While little or no archaeological study has been done, it is clear through observation and comparison with the archaeological investigations of other historic sites that Waterford has a great deal of potential archaeological significance. Numerous sites in Waterford are likely to yield information important in understanding the broad patterns or major events of prehistory or history. Archaeological investigations in yards and open areas can be expected to reveal artifacts and features (wells, trash pits, foundations of former outbuildings, etc.) that would provide additional insight into land use, socio-economic status and change, and the day-to-day lives of Waterford's inhabitants over the past 250 plus years. For example, archaeological investigations provide a great deal of additional information about the evolution of mill sites and mill races. In addition to the present mill, an earlier 18<sup>th</sup> century mill site exists toward the north and may have potential for supporting interpretation of 18<sup>th</sup> century milling history. Committee members visiting the site noted many foundations where buildings (and outbuildings) once stood. All of these have rich archaeological potential to interpret the evolution of this rural milling village.

### **Regarding 17VAC5-30-50. Integrity**

The Code cites seven aspects of integrity: Location, Design, Setting, Materials, Workmanship, Feeling and Association. The Committee assessed all points of integrity.

*Location:* Integrity of location is usually considered more applicable to individual buildings rather than districts since a building that has been moved loses its connections to historic events and its original setting. With the exception of one building that was moved to its current site within the last 150 years, the buildings in Waterford are authentic to the village and remain in their original locations. The village is still surrounded by a landscape that is remarkably intact.

*Design:* Integrity of design is very clear and present. The streets are still in place. The design of the circulation network is intact. In cases where alleys have disappeared, there are visible traces of where they existed. The form, plan, space, structure, and style of the village are intact. The Quakers' and later settlers' designs of community planning, engineering (e.g. mill building and race), and architecture are still apparent. The organization of space, the proportion, scale, architectural technology and ornament of the residents from the period of 1730 to 1919 are very apparent. This is true for the village as a whole, and for the individual buildings within the village. Where some new materials have been introduced, they follow the style and form of earlier materials, maintaining the design.

*Setting:* The village maintains its setting. The spacing of the houses within the village and the relationship of the village to the open agricultural area is intact. When originally listed, the district boundaries were intentionally drawn to include agricultural land surrounding the village. This preserved the viewshed from the village, noted in the nomination as a key component of its historic significance. Though the area northeast of the village has some visible development, the agricultural fields immediately surrounding the core village are highly intact, and modern intrusions do not spoil the viewshed. Additionally, there are no modern intrusions visible across the fields to the east. The viewshed toward the village from inside the boundaries is also generally intact. The vegetation has changed over the years, but the village still has open pasture and tree cover/canopy consistent with c. 1940 images (Historic American Buildings Survey/Library of Congress). Topographic features have not changed.

*Materials:* There is a preponderance of original material. Where there is evolved and replacement material used, it is not overpowering and does not dominate the overall visual cohesion of the historic district.

*Workmanship:* One of the most important points of integrity, Waterford displays the construction methods that show different periods of technology and indicate the relative sophistication of the builders during the period 1730-1919. Fine stone and log construction represent some of the earlier settlers. Fine brick work and Federal period milling celebrate the prosperous 19<sup>th</sup> century. Italianate and Victorian styles are evident in the last burst of historic building construction after the Civil War. In many places, the work is of museum quality.

*Feeling:* Waterford retains an expression of the aesthetic or historic sense of the period between 1730 and 1919. The diversity of architectural styles, the material integrity, and the superb viewshed from the village and toward the village from the outer boundaries all support authenticity of feeling.

*Association:* Waterford's historic associations cover the broad period of 1730 to 1919. There are physical remnants from the complete spectrum of development. The strongest trend of historic association is the period between c. 1800 and 1900, simply because the town grew relatively quickly over the 19<sup>th</sup> century and growth slowed in the 20<sup>th</sup> century.

**Integrity Summary:** Waterford ranks highly in retention of physical integrity. The Committee's overall impression was that Waterford's quality of integrity supports the historic Criteria 1, 3, and 4 at an outstanding level and is one of the finest and most intact village historic districts on the Virginia Landmarks Register.

### **Committee Recommendations and Further Work**

The Committee concluded that Waterford meets the Code Criteria for listing and that there is a high level of physical integrity. Committee members also concurred that there is room for improving the existing documentation in the nomination. The 1969 nomination is typical of a standard short form at that period. At that time the short form was used for many sites whose historic and/or architectural importance were so obvious and outstanding as to require few details or documentation including such sites as Monticello, the Alexandria Historic District, Mount Vernon, and the Virginia State Capitol. Mount Vernon, for instance, has a one sentence statement of significance: "Home of George Washington, Commander-in-Chief of Patriot forces during the Revolution and outstanding Statesman, serving as first President of the United States." Started in 1966, the National Register form (the form that serves for both state and federal listing in Virginia) was a short document, and the most important sites, such as those cited above and including Waterford, were designated using short statements. Whenever the Department has an opportunity to update a nomination, such as was done recently for the Virginia State Capitol, it goes forward with the effort. The staff members were unanimous in recommending a nomination update that would expand the period of significance up to 1957 and include the following official areas of significance: Architecture, Agriculture, Archaeology: Historic Non-Aboriginal, Commerce, Community Planning and Development, Education, Industry, Religion, Social History and Ethnic Heritage: Black. These areas are explained in National Park Service Bulletin 16A (<http://www.cr.nps.gov/nr/publications/bulletins/nrb16a/>). The updated nomination would not replace the original nomination; it is considered "Additional Documentation."